

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA

In re:	)	Case No. 23-30132
	)	(Chapter 11)
CHRISTOPHER WAYNE GLENN	)	
	)	
Debtor.	)	

**AMENDED NOTICE OF MOTION TO  
AMEND CONFIRMED PLAN OF REORGANIZATION**

NOTICE IS HEREBY GIVEN that Christopher Wayne Glenn has filed a motion to amend his confirmed plan of reorganization by removing the Subchapter V trustee as the disbursing agent and allowing Mr. Glenn to make disbursements himself. Aside from retitling the confirmed plan, no other proposed amendments are sought in the motion.

NOTICE IS FURTHER GIVEN that written objections to the motion, if any, shall be filed with the Clerk of the United States Bankruptcy Court for the District of North Dakota, 655 1st Ave. N. Suite 210, Fargo, ND 58102-4932 within twenty-one (21) days from the date of the mailing of this notice. Any objections not filed and served may be deemed waived.

Respectfully submitted,

Dated: August 11, 2024

By: /s/ Maurice B. VerStandig  
Maurice B. VerStandig, Esq.  
The Dakota Bankruptcy Firm  
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*Counsel for Mr. Glenn*

*[Certificate of Service on Following Page]*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 11th day of August, 2024, a copy of the foregoing was served electronically upon filing via the ECF system, with copies being thereby sent to:

Sarah J. Wencil, Esq.  
Office of the U.S. Trustee  
Suite 1015 U.S. Courthouse  
300 South Fourth Street  
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Counsel for the US Trustee

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Subchapter V Trustee

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Counsel for Lighthouse Management Group  
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Kathryn A. Klein, Esq.  
Riezman Berger, P.C.  
7700 Bonhomme Avenue, 7th Floor  
St. Louis, Missouri 63105  
Counsel for JPMorgan Chase Bank, N.A.

I FURTHER CERTIFY on August 12, 2025, a copy of the foregoing—alongside the underlying motion (sans exhibits) and the proposed amended plan of reorganization—is being sent via US Mail, postage prepaid, to all parties on the attached mailing matrix *except* for those receiving service via CM/ECF.

/s/ Maurice B. VerStandig  
Maurice B. VerStandig